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*Newell Rubbermaid Sales & Marketing Group, Inc.*

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

NEWELL RUBBERMAID SALES &  
MARKETING GROUP, INC.,

Plaintiff,

vs.

LEE TSUKROFF,

Defendant.

Civil Action No. 2:15-cv-06258-KSH-CLW

*Document filed electronically*


**STIPULATION VACATING CLERK'S  
ENTRY OF DEFAULT, WITHDRAWING  
MOTION FOR DEFAULT JUDGMENT,  
AND CONSENTING TO THE FILING OF  
DEFENDANT'S ANSWER**

**IT IS HEREBY STIPULATED AND AGREED** by and between Plaintiff  
Newell Rubbermaid Sales & Marketing Group, Inc. ("Newell Rubbermaid"), and  
Defendant Lee Tsukroff ("Tsukroff"), through their undersigned counsel, as follows:

1. The Clerk's Entry of Default dated October 2, 2015 against Tsukroff for failure to plead or otherwise defend is hereby vacated;
2. Newell Rubbermaid's Motion for Default Judgment (Document No. 8), currently returnable on November 2, 2015, is hereby withdrawn; and
3. Newell Rubbermaid consents to the filing of Tsukroff's Answer (Document No. 10).

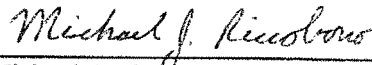
IT IS FURTHER STIPULATED AND AGREED that: (1) this Stipulation may be executed in counterparts, and (2) facsimile signatures shall have the same force and effect as originals.

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*Lee Tsukroff*

By:   
Marco A. LaRacca


Dated: October 22, 2015

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*Newell Rubbermaid Sales & Marketing Group, Inc.*

By:   
Michael J. Riccobono

Dated: October 22, 2015

**SO ORDERED.**

  
Hon. Cathy L. Waldor, U.S.M.J.

10/22/15